



WILLIAMS, PORTER, DAY & NEVILLE P.C.
Wyoming's Law Firm

Exhibit D

Amazon Defendants' Motion for Protective Order
DeBeer v. Amazon Logistics, Inc., et al.

Stuart Day WSB #5-2244
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Attorneys for Amazon Defendants

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF WYOMING**

KIMBERLY DEBEER, surviving spouse and)
 wrongful death personal representative of)
 DANIEL DEBEER, deceased,)
)
 Plaintiffs,)
)
 v.)
)
 AMAZON LOGISTICS, INC. d/b/a)
 PRIME, AMAZON.COM, INC.,)
 AMAZON.COM SERVICES LLC,)
 AAF555 LLC, NORTHWEST EXPRESS, LLC,)
 ASD EXPRESS, LLC, and JUSTIN NZARAMBA)
)
 Defendants.)

Civil No. 23-CV-33-ABJ

**AMAZON LOGISTICS, INC. D/B/A PRIME, AMAZON.COM, INC., AND
 AMAZON.COM SERVICES, LLC’S FIRST SUPPLEMENT TO RULE 26(a)(1) INITIAL DISCLOSURES**

Pursuant to Rule 26(e) of the Federal Rules of Civil Procedure, Defendants Amazon Logistics, Inc., Amazon.com, Inc., and Amazon.com Services LLC (hereinafter collectively referred to as “Amazon” or individually by name), by and through their counsel, hereby provides the following supplement to their initial disclosure as follows:

(Remainder of Page Left Blank Intentionally)

DISCLAIMER

The following routine discovery is provided in compliance with FED. R. CIV. P. 26(a)(1) and FED. R. CIV. P. 26(e). Compliance with the Rules requires the disclosure of potential witnesses likely to have discoverable information that Amazon *may* use to support their claims or defenses, and the disclosure of documents that Amazon *may* use to support their claims or defenses. While Amazon has in its investigation discovered the names of witnesses and documents set forth below, it is not listing them as witnesses or exhibits to be introduced at the trial of this matter. Rather, it is simply complying with the requirements of FED. R. CIV. P. 26(a)(1) and FED. R. CIV. P. 26(e) in a good faith disclosure of potential witnesses and documents. Amazon reserves the right to contest the relevancy and admissibility of the disclosed witnesses and documents, if necessary, based upon further discovery in this case.

Rule 26(a)(1)(A)(i): The name and, if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

1. **Amazon Logistics, Inc., Amazon.com, Inc., and Amazon.com Services, LLC.** Amazon Logistics, Inc., Amazon.com, Inc., and Amazon.com Services, LLC (“Amazon”) had a trailer that was being hauled by independent carrier(s) involved in the subject accident. Previously, Amazon provided that “[o]ne or more representatives of Amazon may have knowledge and information regarding claims set forth in Plaintiffs’ *Complaint*,” which was referring to one or more corporate representatives such as Amazon’s 30(b)(6) representative witness. As an effort of full disclosure and good faith cooperation, Amazon is hereby identifying Ryan Sandefur as one of these representatives. Mr. Sandefur is a Senior Manager for Amazon Logistics, Inc. He, along with one or more additional representatives, is expected to have knowledge and information regarding claims, issues and defenses raised by or in response to Plaintiffs’ *Complaint*.

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2. Amazon reserves the right to supplement this list with any additional persons who may have any discoverable information, or persons needed to lay foundation for any relevant document that may become known in discovery. In addition, Amazon reserves the right to list any persons listed by any other party, any rebuttal witnesses and/or any impeachment witnesses.

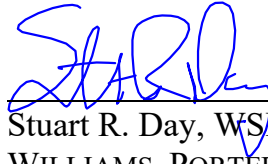
Rule 26(a)(1)(D): For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

1. Amazon maintains that it should be entitled to coverage as an “additional insured” under one or more of its co-Defendant’s insurance policies. Please see disclosures of AAF55 Inc., in response to Federal Rule of Civil Procedure 26(a)(1)(D). Secondary to any insurance policies issued to any codefendant, Amazon maintains insurance applicable by and through an insuring agreement entered into with Zurich American Insurance Company under Policy No. BAP 4678512-06 which provides ten million dollars (\$10,000,000) in commercial coverage for the relevant time. The Zurich policy agreement and terms are maintained by the parties and terms set forth therein as “Confidential” and will only be produced under the protection and requirements set forth in the Court’s *Stipulated Protective Order* upon entry.

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DATED this 16th day of August 2023.

AMAZON LOGISTICS, INC., AMAZON.COM,
INC., AND AMAZON.COM SERVICES LLC,
Defendants.



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CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the foregoing was served upon all counsel of record, specifically provided below, by electronic service this 16th day of August 2023.

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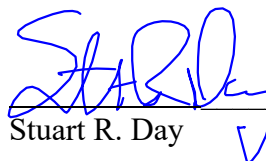
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